

REMARKS

This Application has been carefully reviewed in light of the Office Action mailed July 9, 2007. Claims 1-20 are pending in this Application and Claims 1-9 and 12-17 are rejected. Claims 9 and 11 have been amended and Claim 10 has been cancelled. Applicant respectfully requests reconsideration and favorable action in this case in view of the following remarks.

Allowable Subject Matter

Applicant gratefully acknowledges the Examiner's allowance of Claims 18-20. Applicant also notes with appreciation the indication that Claims 10-11 would be allowable if rewritten in independent form. Applicant has rewritten Claim 10 in independent form as Claim 9. Thus, Claim 9 is allowable as are all claims depending therefrom. Favorable action is requested.

Section 102 and 103 Rejections

The Office Action rejects Claims 1-3, 6-9, and 14-17 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,453,067 issued to Morgan ("Morgan"). The Office Action rejects Claims 4-5 and 12-13 under 35 U.S.C. 103(a) as being unpatentable over *Morgan* in view of U.S. Publication No. 2003/0194131 issued to Zhao, et al. ("Zhao"). Applicant respectfully traverses these rejections for the reasons described below.

Claim 4 is allowable at least because the cited references do not teach or suggest a formatter that "adjusts the hue of the color associated with the clipped pixel and the saturation level associated with the color that was specified by the signal to a color having a substantially similar hue and a substantially similar saturation level as the color that was specified by the signal." The Office Action concedes that *Morgan* does not disclose the above limitations. *See* Office Action, Page 5. Rather, the Office Action relies on Paragraphs 53 and 63 of *Zhao* to teach the above limitations, but this is incorrect. *Zhao* merely discloses determining whether a pixel is in the foreground or a background of a frame by **comparing** the pixel to a second pixel in a second frame, but *Zhao* does not teach or suggest **adjusting** the hue and saturation level, and *Zhao* certainly does not teach or suggest **adjusting** the hue

and saturation level “to a color having a substantially similar hue and a substantially similar saturation level as the color that was specified by the signal.” Lacking such details, *Zhao* does not teach or suggest the above limitations. For at least these reasons, Claim 4 is allowable. Reconsideration and favorable action are requested.

Claim 5 is allowable at least because the cited references do not teach or suggest a formatter that “adjusts the hue of the color associated with the clipped pixel and the saturation level associated with the color that was specified by the signal to a color having a substantially similar hue and a different saturation level as the color that was specified by the signal.” The Office Action concedes that *Morgan* does not disclose the above limitations. *See* Office Action, Page 5. Instead, the Office Action relies on Paragraphs 53 and 63 of *Zhao* to teach the above limitations, but this is incorrect. Again, *Zhao* is directed to determining whether a pixel is in the foreground or a background of a frame. Thus, *Zhao* compares the pixel to a second pixel in a second frame, but at no point does *Zhao* teach or suggest adjusting the hue and saturation level, and *Zhao* certainly does not teach or suggest adjusting the hue and saturation level “to a color having a substantially similar hue and a different saturation level as the color that was specified by the signal.” Lacking such details, *Zhao* does not teach or suggest the above limitations. For at least these reasons, Claim 5 is allowable. Reconsideration and favorable action are requested.

Claim 1 is allowable at least because the cited references do not teach or suggest a “formatter operable to receive the amplified signal and to adjust the hue of the color associated with the at least one clipped pixel and a saturation level associated with the color that was specified by the signal.” The Office Action contends that *Morgan* teaches the above limitations at Column 13, lines 13-14, but this is incorrect. Even assuming for the sake of argument that *Morgan* teaches a gain module operable to apply a gain level to amplify a signal, *Morgan* does not teach or suggest a formatter operable to receive the amplified signal and adjust a saturation level. Instead, as noted by the Office Action, *Morgan* merely discloses “adjusting the gain level” based on the saturation level at the alleged gain module. *See* *Morgan*, Column 13, lines 10-14. Thus, the Office Action fails to point to both a gain module and a formatter, where the formatter is coupled to the gain module and is “operable to receive the amplified signal and to adjust the hue of the color associated with the at least

one clipped pixel and a saturation level associated with the color that was specified by the signal,” as required by Claim 1. For at least these reasons, Claim 1 is allowable, as are all claims depending therefrom. Reconsideration and favorable action are requested.

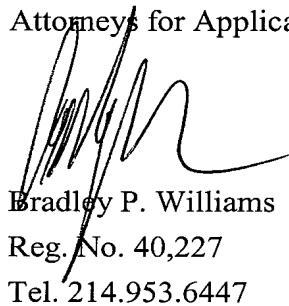
CONCLUSION

Applicant has made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other apparent reasons, Applicant respectfully requests full allowance of all pending Claims. If the Examiner feels that a telephone conference or an interview would advance prosecution of this Application in any manner, the undersigned attorney for Applicant stands ready to conduct such a conference at the convenience of the Examiner.

Applicant believes no fee is due. However, should there be a fee discrepancy, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 20-0668 of Texas Instruments Incorporated.

Respectfully submitted,

BAKER BOTTS L.L.P.
Attorneys for Applicant



Bradley P. Williams
Reg. No. 40,227
Tel. 214.953.6447

Date: 10/9/07

CORRESPONDENCE ADDRESS:

Customer Number: **23494**